

1 Honorable Richard A. Jones
2
3
4
5
6
7

8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

10 WILLIAM ANDERSON,

11 Plaintiff,

12 v.

13 THE BASEBALL CLUB OF SEATTLE d/b/a
14 THE SEATTLE MARINERS; THE CITY OF
15 SEATTLE; LARRY HARVEY; LARRY
16 MEYER; OFFICER TIMOTHY RENIHAN;
17 TRENT BERGMAN; OFFICER DAVID
18 SULLIVAN; OFFICER JUAN ORNELAS;
19 JOHN DOES NO. 1-10,

20 Defendants.

21 No. C09-0850RAJ

22 STIPULATED MOTION FOR ORDER
23 EXTENDING DEADLINES TO FILE
24 RESPONSES TO MOTIONS *IN LIMINE*
25 AND THE PARTIES' PROPOSED PRE-
26 TRIAL ORDER

27 Note for Hearing: December 22, 2010

Come now the parties and respectfully file a stipulated motion requesting that the Court extend (1) the deadline to file any responses to the pending motions *in limine*, see Dkt. Nos. 70, 72, 74, and 76, which is currently December 31, 2010; and (2) the deadline to file the parties' proposed Pre-Trial Order, which is currently January 4, 2011. The parties ask, in the interests of efficiency, that the Court re-set the aforementioned deadlines to 7 days after the issuance of the Court's ruling on the parties' respective dispositive motions (Dkt. Nos. 48, 50, 57 and 58), the

28 ///

29 ///

30 ///

31 STIPULATED MOTION FOR ORDER
32 EXTENDING DEADLINES TO FILE RESPONSES TO MOTIONS IN
33 LIMINE AND PROPOSED PRE-TRIAL ORDER - 1
34 No. C09-0850RAJ

35 9333.1 d1221401

36 MACDONALD HOAGUE & BAYLESS
37 705 Second Avenue, Suite 1500
38 Seattle, Washington 98104
39 Tel 206.622.1604 Fax 206.343.3961

resolution of which may significantly impact the scope and content of both the responses to the motions *in limine* and the proposed Pre-Trial Order.

DATED this 22nd day of December, 2010.

Respectfully submitted,

MacDONALD HOAGUE & BAYLESS

By D. H. K.
The 1st, May 1, 1994 A.D. # 5001

Timothy K. Ford, WSBA # 5986
TimF@mhb.com
David J. Whedbee, WSBA # 35977
DavidW@mhb.com
Attorneys for Plaintiff

STAFFORD FREY COOPER

By /s/ by e-mail authorization
THERON BUCK, WSBA #22029
tbuck@staffordfrey.com
PETER MULLENIX, WSBA #37171
pmullenix@staffordfrey.com
ATTORNEYS FOR SEATTLE POLICE OFFICER DEFENDANTS

PERKINS COIE

By /s/ by e-mail authorization
David Burman, WSBA #10611
dburman@perkinscoie.com
Ryan Mrazik, WSBA #40526
RMrazik@perkinscoie.com
Attorneys for The Baseball Club of Seattle and
Larry Harvey

PETER S. HOLMES, Seattle City Attorney

By /s/ by e-mail authorization
Patrick Downs, WSBA #27256
patrick.downs@seattle.gov
Attorneys for the City of Seattle

**STIPULATED MOTION FOR ORDER
EXTENDING DEADLINES TO FILE RESPONSES TO MOTIONS IN
LIMINE AND PROPOSED PRE-TRIAL ORDER - 2
No. C09-0850RAJ**

MACDONALD HOAGUE & BAYLESS
705 Second Avenue, Suite 1500
Seattle, Washington 98104
Tel 206.622.1604 Fax 206.343.3961

1 **DECLARATION OF SERVICE**

2 The undersigned hereby declares under penalty of perjury that on the date below stated, I
3 electronically filed the foregoing with the Clerk of Court using the CM/ECF System which will
4 send notification of such filing to the following:

5 David J. Burman dburman@perkinscoie.com, docketsea@perkinscoie.com,
6 jmccluskey@perkinscoie.com

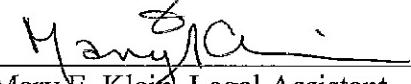
7 THERON A BUCK tbuck@staffordfrey.com, dmashburn@staffordfrey.com,
8 hguthrie@staffordfrey.com, lreese@staffordfrey.com, vstegic@staffordfrey.com

9 PETER J MULLENIX pmullenix@staffordfrey.com, hguthrie@staffordfrey.com,
10 vstegic@staffordfrey.com

11 PATRICK DOWNS patrick.downs@seattle.gov, debra.hernandez@seattle.gov,
12 erin.ferguson@seattle.gov, rose.hailey@seattle.gov

13 RYAN T. MRAZIK RMrazik@perkinscoie.com, amontclair@perkinscoie.com,
14 docketsea@perkinscoie.com

15 I declare under penalty of perjury under the laws of the United States and Washington
16 state that the foregoing is true and correct. Executed at Seattle, Washington, on December 22,
17 2010.

18 
19 Mary E. Klein, Legal Assistant
20 MacDonald Hoague & Bayless
21 705 2d Avenue, Suite 1500
22 Seattle, Washington 98104-1746
23 Tel 206-622-1604 / Fax 206-343-3961
24 maryk@mhb.com